



STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

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January 31, 1991

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SOLAR BRANCH

Mr. Dean Fowler
Spokane County Utilities
North 811 Jefferson Street
Spokane, Washington 99201

RE: Comments on Colbert Landfill Quality Assurance Plan for
Meteorological Measurements

Dear Mr. Fowler:

Ecology has reviewed the Plan, and encloses comments with this letter. Our reviewers find the plan in agreement with Air Quality Program Guidance, but have concerns over validation, auditing and inspection. Specific comments follow:

1. The action taken when data fails a Quality Control (Q/C) check should be clarified. A stronger statement defining the errors which will cause data to be discarded should be incorporated. Infrequent Quality Assurance (Q/A) checks increase the risk that large periods of data, perhaps back to the previous Q/A check, may have to be discarded if unresolved Q/C failures are allowed to accumulate.
2. As described in Section 5.0, performance audits will be conducted once a year in place of a calibration. There is no schedule given which indicates if the first audit will take place at the end of one year of operation with audits every year thereafter, or if the first audit may occur sooner than one year of operation, and audits occurring every year from that date. For example, the first audit might take place at 3 months, with successive audits at 15 months, 27 months, and so forth. It might be beneficial to run an audit early in the operation of the station, so as to minimize the amount of data that might later require compensation for system bias.
3. Section 7.0 states that the data stream from the station will be inspected weekly at the start of operation, and bi-weekly thereafter. However, there is no indication of the duration of the "start of the operation" phase, so it cannot be determined how many weekly inspections this schedule will entail.

If you have any questions, please contact me at (206) 438-3079.

Sincerely,

Michael Kuntz
Site Cleanup Section
Toxics Cleanup Program

cc: Neil Thompson, EPA
Larry Beard, Landau Assoc.

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